

February 14, 2005

Randy Segawa
California Department of Pesticide Regulation
1001 I Street
P.O. Box 4015
Sacramento, CA 95812-4015

Re: Comments to California Department of Pesticide Regulations Environmental Justice Pilot Project, Pesticide Air Monitoring in a Rural Community

Dear Mr. Segawa:

Thank you for this opportunity to provide additional comments on the Department of Pesticide Regulations Environmental Justice Pilot Project. Please see our comments below.

- WPHA supports DPR's selection of Parlier as the location for the Pilot Project. Parlier meets all the EJ criteria for this project, including child population under 18 years of age, minority populations, family income and pesticide drift illnesses. There are also several collaborative efforts underway in the area that will complement this pilot project. ARB plans to conduct special air monitoring for dioxins in Parlier beginning in early 2005, the University of California at Davis, Agricultural Health and Safety Center plans to study occupational and environmental health hazards in a migrant farm-worker population. Also, the University of California San Francisco as well as the Valley Air Pollution Health Effects Research Institute in Fresno are planning for a study to evaluate correlations between asthma in children and air toxics, this study will include pesticides. The California Environmental Health Tracking Program and Cal EPA's Office of Environmental Health Hazard Assessment will be conducting a pilot project in the San Joaquin Valley to demonstrate the feasibility of linking exposure (including pesticides) and health outcomes data.

There are also several support groups and organizations in the proximity of Parlier that could be used as resources. The United States Department of Agriculture, (Agricultural Research Service) at Kearney Agricultural Research Station is near by and several U.C. researchers are stationed there. Fresno State College is near by and there are possible resources there that could be used.

Because of the above mentioned studies and because of meeting all the necessary criteria in the DPR Pilot Project outline, we support the decision of DPR to select Parlier.

- DPR must look at subsequent air monitoring in the up coming years. One study does not represent the condition of air quality throughout all rural communities therefore subsequent air monitoring will be necessary and additional funding required.
- The project looks at only one source of airborne exposure, pesticides, without consideration of the numerous other airborne sources such as dioxin/PCBs, heavy metals, radon, asbestos, pollen, molds, etc.
- WPHA believes that the Department should inventory existing scientific peer reviewed studies to avoid any duplications. Rather than initiate another monitoring program, the Department's limited resources could be best utilized by analyzing existing data already available. In particular, efforts by DPR in Lompoc and by USEPA in McFarland Park have already demonstrated very low to non-detectable levels of pesticides below any levels likely to cause adverse health effects. Isolating pesticides alone without including other potential contributors is inappropriate and skews the data. As was done with the Lompoc and McFarland Park studies, air monitoring should investigate exposure to metals, vehicle exhaust, natural environmental contributors (radon, asbestos, pollen, etc.) and other factors so that the appropriate weight can be given to sources of airborne exposures.
- With the advanced technology and instrumentation available today, scientists can find micrograms and nanograms of molecules in the air at parts per million, parts per billion, and potentially even lower levels. There should be a "No Effects Level" or a "Limit of Quantification" level .

Reports of trace or barely measurable amounts of pesticides that are "detectable" but not "quantifiable" could lead to misrepresentation. Detections must clearly be explained as to their impact on the community of concern.

- The standards that will be used to determine whether levels exceed those of human health concerns should be made clear. They should be based on establish peer-reviewed science. WPHA feels that the pesticides monitored have clear defined health effects levels prior to the onset of exposure monitoring.
- In the Department's outline they express the desire to investigate the cumulative impacts of multiple pesticide exposures. Any undertaking to develop cumulative impact analysis should be science based.

Thank you for the opportunity to comment,

Kevin Keefer
Director of Environmental and Regulatory Affairs